

THOMAS F. PITARO, ESQ.
Nevada Bar No. 001332
1212 S. Casino Center Blvd.
Las Vegas, Nevada 89104
(702) 382-9221
Attorney for Defendant
WILLIAM BONAPARTE

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA.

Plaintiff,

vs.

WILLIAM BONAPARTE.

Defendant.

Case No. 2:12-CR-00132-MMD-RJJ

**DEFENDANT'S MOTION TO
CONDUCT A PRE-PLEA PRE-
SENTENCING INVESTIGATION
REPORT AND PROPOSED ORDER**

COMES NOW the defendant, **WILLIAM BONAPARTE**, by and through his attorney of record, **THOMAS F. PITARO, ESQ.**, and hereby moves this Court request a Pre-Plea Pre-Sentence Investigation Report be prepared by the Probation department.

1. The defendant is charged in a 10 count Indictment stemming from several alleged armed robberies. The defendant is unsure of his prior convictions and believes that his criminal history could be anywhere from a level 1 to a level 3. The disparity in a potential sentence between these criminal history levels is substantial, and what possible sentence the defendant will face will highly effect negotiations and the ability to work out a potential guilty plea.

2. Undersigned counsel therefore respectfully requests an order that the Department of Probation conduct a pre-plea pre-sentence investigation report to determine the Defendant's criminal history category as soon as possible.

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Law Office of Thomas F. Pitari
330 S. THIRD STREET
SUITE 860
LAS VEGAS, NV 89101
(702) 382-9221

3. Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney Cristina Silva regarding this request and she has no opposition.

DATED this 4th day of March, 2013.

/S/ Thomas F. Pitaro

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Las Vegas, Nevada 89104
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**Law Office
of
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9 Plaintiff,

10 VS.

11 **WILLIAM BONAPARTE,**

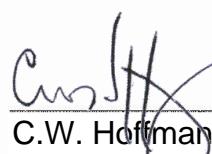
12 Defendant.
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14 Case No. 2:12-CR-00132-MMD-CWH

15 **ORDER**

16 **IT IS HEREBY ORDERED** that the Probation Department will prepare a Pre-Plea Pre-
17 Sentence Investigation Report on Defendant William Bonaparte.

18 **DATED** this the 5th day of March, 2013.

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C.W. Hoffman, Jr.
United States Magistrate Judge
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